

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

**DECLARATION OF REZA MIRAIE IN SUPPORT OF
PLAINTIFF HEADWATER RESEARCH LLC'S OPPOSITION TO
SAMSUNG'S MOTION TO STAY PENDING *INTER PARTES* REVIEW**

I, Reza Mirzaie, declare and state as follows:

1. I am a member of the State Bar of California and an attorney at the firm of Russ August & Kabat, counsel of record for Plaintiff Headwater Research LLC (“Headwater”) in the above-captioned action. I submit this declaration in support of Headwater’s Opposition to Samsung’s Motion to Stay Pending *Inter Partes* Review. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit 1 is a true and correct copy of emails exchanged between the parties’ counsel on January 9 and 10, 2025.

3. Attached as Exhibit 2 is a true and correct copy of the Request for Director Review filed by Headwater in IPR2024-01407 on April 3, 2025 (Paper No. 11).

4. Attached as Exhibit 3 is a true and correct copy of an email from the PTAB, dated April 4, 2025, confirming receipt of Headwater’s Request for Director Review in IPR2024-01407 and authorizing a response from Petitioner.

5. Attached as Exhibits 4–7 are true and correct copies of stipulations by Samsung regarding IPR2024-01337, IPR2024-01407, IPR2024-01396, and IPR2024-01051.

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct.

Executed on April 17, 2025 at Marshall, Texas.

/s/ Reza Mirzaie
Reza Mirzaie